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**Donald C. Brittingham**  
Director – Wireless/Spectrum Policy

September 28, 2004

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

**Re:   *Ex Parte* Presentation**  
**WT Docket No. 03-103; “Air-Ground Telecommunications Services”**

Dear Ms. Dortch:

Today, Leslie Owsley, Assistant General Counsel for Verizon, Mike Senkowski of Wiley Rein & Fielding, counsel to Verizon Airfone, and the undersigned met with Jennifer Manner, Senior Counsel to Commissioner Abernathy, to discuss the Commission’s pending rulemaking on the Air-to-Ground service. A copy of the presentation is attached.

Verizon Airfone stressed the importance of implementing a licensing regime that would facilitate the provision of a Broadband Air-to-Ground service in the 800 MHz band, and noted that the band sharing techniques proposed by AirCell and Boeing would not support the provision of such a service. Airfone also noted that there is already competition for Air-to-Ground services from satellite-based operators and changes to the Commission’s Rules are necessary to facilitate the provision of services by terrestrial competitors. We provided Ms. Manner with a copy of a white paper entitled “Satellite Competition to Terrestrial Air-to-Ground Service” as well as supplemental information demonstrating the competition that exists for Air-to-Ground service.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Sincerely,

/s/ Donald C. Brittingham  
Donald C. Brittingham

Attachments

cc: Jennifer Manner